

5929 Balcones Drive, Suite 200 Austin, TX 78731-4280 Phone: 512.343.2544

Fax: 512.343.0119

REDACTED - FOR PUBLIC INSPECTION

VIA ECFS

July 1, 2014

Ms. Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, S.W. Washington, D.C. 20554

RE: <u>REQUEST FOR CONFIDENTIAL TREATMENT</u> – Connect America Fund, WC Docket No. 10-90; Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42

Request that Information Submitted to the Commission be Withheld from Public Inspection Pursuant to 47 C.F.R. §0.459 and 5 U.S.C. §552(b)(4): Five-Year Service Quality Improvement Plan included in FCC Form 481

Confidential Financial Information – Subject to Protective Order in WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Before the Federal Communications Commission

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, Scott County Telephone Company, Inc. (the Company), Study Area Code 442065, is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS) in WC Docket Nos. 10-90 and 11-42. The Company, by its authorized representative, hereby requests confidential treatment of two attachments to its FCC Form 481: (1) the five-year service quality improvement plan and (2) the financial annual report, both of which were redacted in the ECFS submission. The request for confidential treatment of the five-year plan is being made pursuant to Section 0.459 of the Commission's rules and Exemption 4 of the Freedom of Information Act (FOIA). The request for confidential treatment of the financial annual report is being made pursuant to the FCC's November 16, 2012 *Protective Order* in WC Docket No. 10-90 *et al.* These attachments contain competitively sensitive data that Scott County Telephone Company, Inc. maintains as confidential and does not normally make available to the public. Release of this information would have a substantial negative impact on the Company.



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Five-Year Service Quality Improvement Plan

Pursuant to section 0.459 of the Commission's rules and Exemption 4 of FOIA, Scott County Telephone Company, Inc. requests that the text and data extracted from its five-year service quality improvement plan be withheld from public inspection because it contains competitively sensitive commercial and financial information that the Company keeps confidential. Public availability of this information would have a substantial negative impact on the Company.

In accordance with Section 0.459 of the Commission's rules, the following information is provided in support of this request:

(1) Identification of the specific information for which confidential treatment is sought:

Attachment to Line 112 of FCC Form 481 – Five-Year Service Quality Improvement Plan. Specifically, confidential treatment is sought for all information in the five-year plan related to the Company's access line counts, existing broadband capabilities, and its network investment plans through 2019 that will improve service quality for its customers.

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

The information was submitted in WC Docket Nos. 10-90 and 11-42 as an attachment to FCC Form 481- the Carrier Annual Reporting Data Collection Form. Section 100 of FCC Form 481 requires incumbent local exchange carriers receiving high cost support to attach a five-year service quality improvement plan, pursuant to 47 C.F.R. §§54.202(a)(1)(ii) and 54.313(a)(1).

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

The five-year service quality improvement plan contains granular information on the Company's access line counts and existing broadband capabilities as well as detailed plans for financial investments in its network through 2019 to improve service to subscribers. This is closely guarded, privileged information that the Company does not make publicly available.

(4) Explanation of the degree to which the information concerns a service that is subject to competition:

Broadband is subject to increasing competition in the areas served by rural, rate-of-return incumbent local exchange carriers (RLECs). Virtually all RLECs face competition from one or more wireless Internet service providers. Most RLECs also face competition from at least one other wireline broadband provider such as a larger cable company, who will typically seek to "cherry pick" the lower cost portions of the study area. In addition, all RLECs face competition throughout their territories from satellite broadband providers.



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(5) Explanation of how disclosure of the information could result in substantial competitive harm:

Disclosure of the information contained in the five-year plan would provide competitors with detailed, granular information regarding the Company's access line count, its existing broadband capabilities, and its strategic plans for network investments. This would give competitors invaluable confidential information with which to develop their own strategies for investing in the service area, thereby bringing substantial competitive harm to the Company.

(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

The Company has continually treated the extracted information in its five-year plan as confidential and carefully controls the information to protect it from competitors. Access to the information is limited to employees that require it and to non-employees with confidentiality obligations such as lenders, consultants, auditors, and attorneys. In addition, when such information is required to be submitted to a state regulatory authority it has been filed as confidential information, not available to the public.

(7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

The redacted information in the five-year plan is not available to the public, and third party access is limited as described in (6) above.

(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

The Company requests that the extracted information be withheld from public inspection indefinitely. Although the information reflects the Company's service improvement plans for a five year period, it would provide a very useful baseline for competitors for several years beyond that period.

(9) Any other information that the party seeking confidential information treatment believes may be useful in assessing whether its request for confidentiality should be granted:

Exemption 4 of FOIA shields from public disclosure commercial or financial information obtained from a person that is privileged or confidential. Based on the responses provided above, the information in question satisfies this test.

Financial Annual Report

Section 3005 of FCC Form 481 requires a privately-held rate-of-return carrier receiving high cost support to attach a full and complete annual report of the Company's financial condition and operations pursuant to 47 C.F.R. §54.313(f)(2). Scott County Telephone Company, Inc. seeks confidential treatment of its financial annual report pursuant to the November 16, 2012 *Protective Order* in WC Docket No. 10-90, *et al.*¹ The *Protective Order* specifically covers information filed pursuant to 47 C.F.R. §54.313(f)(2).

¹ Connect America Fund et al., WC Docket No. 10-90 et al., Protective Order, DA 12-1857 (rel. Nov. 16, 2012).



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Scott County Telephone Company, Inc. is providing to the Office of the Secretary, under seal, this cover letter and the Form 481 filing which includes the confidential information that is being requested to be withheld from public inspection.

Each page of the five-year service quality improvement plan confidential submission bears the legend, "CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE."

Each page of the financial annual report confidential submission bears the legend, "CONFIDENTIAL FINANCIAL INFORMATION - SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS. 10-90, 07-135, 05-337, 03-109, CC DOCKET NOS. 01-92, 96-45, GN DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION."

Two copies of the Form 481 filing in redacted form and an accompanying cover letter are also being provided with the confidential filing. Each page of the redacted filing and accompanying cover letter is marked "REDACTED – FOR PUBLIC INSPECTION."

Two copies of this cover letter and the Form 481 filing with the confidential information are also being delivered to Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau.

The confidential information has also been submitted to the Universal Service Administrative Company through its E-File system as an attachment to the FCC Form 481.

This cover letter includes no confidential information and the text is the same in both the non-redacted and redacted versions except for the confidentiality markings.

Please contact me if you have any questions.

Sincerely,

Lisa A. McLaughlin

Authorized Representative for

Lise a. M. Laughlin

Scott County Telephone Company, Inc.

LAM/pjf

Enclosures

cc: Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau, Federal Communications Commission, (2 hardcopies of non-redacted submission)

Ms. Karen Gilliam, Scott County Telephone Company, Inc.

FCC For	m 481 - Carrier Annual Reporting Data Collection Form			FCC Form 481 OMB Control No. 3060- July 2013	0986/OMB Control I	No. 3060-0819
<010>	Study Area Code	403031				
<015>	Study Area Name	SCOTT COUNTY TEL CO				
<020>	Program Year	2015				
	Contact Name: Person USAC should contact with questions about this data	Karen Gilliam				
<035>	Contact Telephone Number: Number of the person identified in data line <030>	4174399778 ext.				
<039>	Contact Email Address: Email of the person identified in data line <030>	karen@scotttel.com				
ANNUA	L REPORTING FOR ALL CARRIERS				54.313 Completion Required (check box whe	54.422 Completion Required
<100>	Service Quality Improvement Reporting		(complete attached wor	ksheet)	√	A I I I I I I
<200> <210>	Outage Reporting (voice)	outages to report	(complete attached wor	ksheet)	√	<u> </u>
<300>	Unfulfilled Service Requests (voice)				· · ·	.,,,,,,,
<310>	Detail on Attempts (voice)					
				(attach descriptive do	ocument)	
<320>	Unfulfilled Service Requests (broadband)			_	✓	
<330>	Detail on Attempts (broadband)					
				(attach descriptive d	locument)	
<400>	Number of Complaints per 1,000 customers (voice)			_		
<410>	Fixed 0.0 Mobile 0.0				✓	✓
<420> <430>	Mobile 0.0 Number of Complaints per 1,000 customers (broadb	l pand)				
<440>	Fixed					
<450> <500>	Mobile 0.0 Service Quality Standards & Consumer Protection R 403031ar510.pdf	ules Compliance	(check to indicate certi	fication)	✓	✓
<510>	405051a1510.pdf		(attached descriptive	e document)	✓	√
						,
<600>	Functionality in Emergency Situations 403031ar610.pdf		(check to indicate certi	fication)	✓	✓
			(attached descriptive do	ocument)	✓	✓
<610>						
<700>	Company Price Offerings (voice)		(complete attached wo	rksheet)	√	
<710>	Company Price Offerings (broadband)		(complete attached wo	rksheet)	√	
	Operating Companies and Affiliates		(complete attached wo			· · · · · · · · · · · · · · · · · · ·
	Tribal Land Offerings (Y/N)? Voice Services Rate Comparability	(if y	res, complete attached wo (check to indicate certi			
110007	403031ar1010.pdf			neationy		
<1010>			(attach descriptive do	cument)	✓	
<1100>	Terrestrial Backhaul (Y/N)?	(if	not, check to indicate cert	ification)		
<1110>			(complete attached wo	orksheet)		
<1200>	Terms and Condition for Lifeline Customers		(complete attached wo	orksheet)		_ ✓
	Price Cap Carriers, Proceed to Price Cap Additional Including Rate-of-Return Carriers affiliated with Price					

(complete attached worksheet)

<2005>

<3000>

<3005>

(100) Se Data Co	(100) Service Quality Improvement Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-05 July 2013	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	403031	
<015>	Study Area Name	SCOTT COUNTY TEL CO	
<020>		2015	
<030>	Contact Name - Person USAC should contact regarding this data	Karen Gilliam	
<032>	Contact Telephone Number - Number of person identified in data line <030>	4174399778 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	karen@scotttel.com	
<110>	Has your company received its ETC certification from the FCC?	(yes / no) O	
<1111>	If your answer to Line <110> is yes, do you have an existing $\$54.202(a)$ "5 year plan" filed with the FCC?	(yes / no) O O	
(113) (113) (115) (116) (117)	If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing \$ 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service. Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. \$ 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service. Please check these boxes below to confirm that the attached documents(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to \$ 54.202(a). The information shall be submitted at the wire center level or census block as appropriate. Maps detailing progress towards meeting plan targets Report how much universal service (USF) support was received How (USF) was used to improve service coverage How (USF) was used to improve service coverage How (USF) was used to improve service capacity Provide an explanation of network improvement targets not met in the prior calendar year.	mpany is a Name of Attached Document	

(200) Service Outage Reporting (Voice)	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	ode .				403031						
<015>	Study Area Name	ame				SCOTT COUNT	COUNTY TEL CO					
<020>	Program Year					2015						
<030>	Contact Name	Contact Name - Person USAC should contact regarding this data	should contact	regarding this	data	Karen Gilliam	am					
<032>	Contact Telep	Contact Telephone Number - Number of person identified in data line <030>	Number of per	son identified	in data line <0		ext.					
<039>	Contact Email	Contact Email Address - Email Address of person identified in data line <030>	Address of per	son identified	in data line <0	30> karen@scotttel.com	tel.com					
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<220>	\ \ \ \	 	<bs></bs> <bs></bs> 	 	<	<c1></c1>	<c2></c2>	\$ \$	<e></e>	÷	<g>></g>	<\ \
	NORS Reference Number	Outage Start Date	Outage Start Time	Outage End Date	Outage End Time	Number of Customers Affected	Total Number of Customers	911 Facilities Affected (Yes / No)	Service Outage Description (Check all that apply)	Did This Outage Affect Multiple Study Areas (Yes / No)	Service Outage Resolution	Preventative Procedures
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Page 3

(700) Pric Data Coll	(700) Price Offerings in Data Collection Form	(700) Price Offerings including Voice Rate Data Data Collection Form	Data				F. OI UL	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	B Control No. 3060-0819
<010>	Study Area Code	nde			403031				
<015>	Study Area Name	ıme			SCOTT COUNT	COUNTY TEL CO			
<020>	Program Year				2015				
<030>	Contact Name	Contact Name - Person USAC should contact regarding this data	l contact regardi	ng this data	Karen Gilliam	iam			
<032>	Contact Telep	Contact Telephone Number - Number of person identified in data line <030>	er of person ider	tified in data line <	<030> 4174399778 ext.	ext.			
<039>	Contact Email	Contact Email Address - Email Address of person identified in data line <030>	ess of person ide	ntified in data line	<030> karen@scotttel.com	ttel.com			
<701>	Residential Lo	Residential Local Service Charge Effective Date	ective Date	1/1	1/1/2014				
<70/>>	Single State-W	Single State-Wide Kesidential Local Service Charge	service Charge						
<703>	<a1></a1>	<a2></a2>	<a3></a3>	 b1>	<bs></bs>	<	 b4>	<	<>>>
	State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fees
					See at	See attached worksheet			
					-				

Data Collection Form	orm.						OMB Cont July 2013	rol No. 3060-0986/	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010> Study Ar	Study Area Code			403031					
<015> Study Ar	Study Area Name			SCOTT COUNTY TEL	IL CO				
<020> Program Year	n Year			2015					
<030> Contact	: Name - Person USA	Contact Name - Person USAC should contact regarding this data	is data	Karen Gilliam					
<035> Contact	: Telephone Numbe	Contact Telephone Number - Number of person identified in data line <030>	d in data line <030>	4174399778 ext.					
<039> Contact	: Email Address - Em	Contact Email Address - Email Address of person identified in data line <030>	d in data line <030>	karen@scotttel.com	.com				
<711>	<a1></a1>	<a2></a2>	<	 	<>>>	<d1></d1>	<d2></d2>	<d3></d3>	<d4>></d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rate and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select }
		1							
				- See affached	bed				
				workshoot	5				
				MOINSHEEL					

do (008)	(800) Operating Companies				FCC Form 481
Data Col	Data Collection Form				OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code		403031		
<015>	Study Area Name		SCOTT COUNTY TEL CO	EL CO	
<020>	Program Year		2015		
<030>		Contact Name - Person USAC should contact regarding this data	Karen Gilliam		
<032>		Contact Telephone Number - Number of person identified in data line <030>	4174399778 ext.		
<039>		Contact Email Address - Email Address of person identified in data line <030>	karen@scotttel.com	com	
<810>	Reporting Carrier	Scott County Telephone Company, Inc.			
<811>		Cypress Break			
<812>		Scott County Telephone Company, Inc.			
<813>		<a1></a1>		<a2></a2>	<a3></a3>
•		Affiliates		SAC	Doing Business As Company or Brand Designation
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(900) Tri	(900) Tribal Lands Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	403031
<015>	Study Area Name	SCOIT COUNTY TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Karen Gilliam
<035>	Contact Telephone Number - Number of person identified	
<039>	Contact Email Address - Email Address of person identified in data line <030>	> karen@scotttel.com
<910>	Tribal Land(s) on which ETC Serves	
<920>	Tribal Government Engagement Obligation	
		Name of Attached Document
If your c to confi demons § 54.313	If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to () § 54.313(a)(9) includes:	Select (Yes,No,
		NA)
<921>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions.	
<922>	Feasibility and sustainability planning;	
<923>	Marketing services in a culturally sensitive manner;	
<924>	Compliance with Rights of way processes	
<925>	Compliance with Land Use permitting requirements	
<926>	Compliance with Facilities Siting rules	
<927>	Compliance with Environmental Review processes	
<928>	Compliance with Cultural Preservation review processes	
<929>	Compliance with Tribal Business and Licensing requirements.	

(1200) Te	(1200) Terms and Condition for Lifeline Customers	FCC Form 481
Lifeline Data Coll	Lifeline Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	403031
<015>	Study Area Name	SCOLT COUNTY TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Karen Gilliam
<032>	Contact Telephone Number - Number of person identified in data line <030>	
<039>	Contact Email Address - Email Address of person identified in data line <030>	karen@scotttel.com
		403031ar1210.pdf
<1210>	· Terms & Conditions of Voice Telephony Lifeline Plans	
		Nama of Attacked Daymant
		Name of Attached Document
<1220>	Link to Public Website	
"Please c	"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to	
§ 54.422(a)(2) a annually report:	§ 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:	
<1221>	Information describing the terms and conditions of any voice	
<1222>	Details on the number of minutes provided as part of the plan,	
<1223>	Additional charges for toll calls, and rates for each such plan.	

(2000) Pi	(2000) Price Cap Carrier Additional Documentation	FCC Form 481	
Data Col.	Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0986/OMB Control No. 3060-0819	itrol No. 3060-0819
Including	Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers	July 2013	
<010>		403031	
<015>	Study Area Name	SCOIT COUNTY TEL CO	
<020>	Program Year	2015	
<030>	Contact Name - Person USAC should contact regarding this data	Karen Gilliam	
<032>	Contact Telephone Number - Number of person identified in data line <030>	4174399778 ext.	
<039>		karen@scotttel.com	
CHECK t	the boxes below to note compliance as a recipient of Incremental Connect Ameri support as set forth in 47 CFR § 54.313(b),(c),(d),(¢	CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.	rica Phase II
	Incremental Connect America Phase I reporting		
<2010>			
<2011>			
	Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))		
<2012>			
<2013>		Ī	
<2014>][
<2015>			
	Price Cap Carrier Connect America ICC Support {47 CFR § 54,313(d)}		
<2016>			
<2017>	Connect America Phase II Reporting {47 CFR § 54.313(e)}		
<2018>			
<2019>			
<2020>	Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	ne 2021, contains the required information shall provide the number, names, and g access to broadband service in the	
<7071>	Interim Progress Community Anchor Institutions		
		Name of Attached Document Listing Required Information	

=	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013
	403031
	SCOTT COUNTY TEL CO
 Voogram Year 	Z 2015
	41743c
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and source has a second	÷
	is nor year service quanty from plansaction to 3 24 cotagn and in the documents attached below is accurate. FR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.
(3010) Progress Report on 5 Year Plan Milestone Certification (47 CFR § 54.313(f)(1)(i)	
	Name of Attached Document Listing Required Information
Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to (3011) § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	ut(s), on line 3012 contains the required information pursuant to es, and addresses of community anchor institutions to which began addresses of community anchor institutions to which began and addresses of community anchor institutions to which began and addresses of community anchor institutions to which began and addresses of community anchor institutions to which began are addresses of community and addresses of commun
(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii)}	
(3013) Is your company a Privately Held ROR Carrier {47 CFR § 54:313(f)(2)}	Name of Attached Document Listing Required Information (Yes/No) (Oes/No)
(3014) If yes, does your company file the RUS annual report	(Yes/No)
Please check these boxes to confirm that the attached document(s), on line	, on line 3017, contains the required information pursuant to $\S54.313(f)(2)$ $_{ m C}$
(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	
(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	tement of Cash Flows
(3017) If the response is yes on line 3014, attach your company's RUS annual	403031ar3017.pdf
	Name of Attached Document Listing Required Information
(3018) If the response is no on line 3014, Is your company audited?	(Yes/No)
	to contains
(3019) Either a copy of their audited financial statement; or (2) a financial report is	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications
(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	atement of Cash Flows
(3021) Management letter issued by the independent certified public accountant that performed the company's financial audit.	countant that performed the company's financial audit.
If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:	(2),
(302) Convofthair financial statement which has been subject to review huan	C SALIN
(2022) Oppy of their infancial statement which has been subject to review by an independent certified budges accounts; or 2) and an independent comparable to RIIS Operating Report for Telecommunications	woyaii Ma Aa
Format Comparable to NOS Operating Nepor Liot Telecommunications Borrowers,	
(3023) Underlying information subjected to a review by an independent certified public accountant	certified
(3024) Underlying information subjected to an officer certification. (3025) Document of Fash Flows	Internant of Cach Elows
Document(s) for balance offeet, me	arenent of cast riows
(3026) Attach the worksheet listing required information	
	Name of Attached Document Listing Required Information

Certification - Reporting Carrier	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	403031
<015>	Study Area Name	SCOTT COUNTY TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Karen Gilliam
<035>	Contact Telephone Number - Number of person identified in data line <030>	4174399778 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	karen@scotttel.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support

recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.

Name of Reporting Carrier:

Signature of Authorized Officer:

Date

Printed name of Authorized Officer:

Title or position of Authorized Officer:

Telephone number of Authorized Officer:

Study Area Code of Reporting Carrier:

Filing Due Date for this form:

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

	ion - Agent / Carrier ection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	403031	
<015>	Study Area Name	SCOTT COUNTY TEL CO	
<020>	Program Year	2015	
<030>	Contact Name - Person USAC should contact regarding this data	Karen Gilliam	
<035>	Contact Telephone Number - Number of person identified in data line <030>	4174399778 ext.	·
<039>	Contact Email Address - Email Address of person identified in data line <030>	karen@scotttel.com	

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

certify that (Name of Agent) <u>Lisa McLaughlin</u> is authorized to submit the information reported on behalf of the reporting carrier. I lso certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized gent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.									
Name of Authorized Agent: Lisa McLaughlin									
Name of Reporting Carrier: SCOTT COUNTY TEL CO									
Signature of Authorized Officer: CERTIFIED ONLINE	Date: 06/30/2014								
Printed name of Authorized Officer: Karen Gilliam									
Title or position of Authorized Officer: General Manager									
Telephone number of Authorized Officer: 4799234200 ext.									
Study Area Code of Reporting Carrier: 403031	Filing Due Date for this form: 07/01/2014								

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Re	ecipients on Behalf of Reportin	g Carrier
, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service su the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the inf		• , .
Name of Reporting Carrier: SCOTT COUNTY TEL CO	·	
Name of Authorized Agent or Employee of Agent: Lisa A. McLaughlin		
Signature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE	Date:	06/30/2014
Printed name of Authorized Agent or Employee of Agent: Lisa A. McLaughlin		
Title or position of Authorized Agent or Employee of Agent Authorized Representative		
Telephone number of Authorized Agent or Employee of Agent: 5126527709 ext.		
Study Area Code of Reporting Carrier: 403031 Filing Due Date for this form: 0	07/01/2014	



FCC Form 481	OMB Control No. 3060-0986/OMB Control No. 3060-0986/OMB Control No. 3060-0819	July 2013
(700) Price Offerings including Voice Rate Data	Data Collection Form	

403031	SCOIT COUNTY TEL CO	2015	Karen Gilliam	4174399778 ext.	line <030> karen@scotttel.com
<010> Study Area Code	<015> Study Area Name	<020> Program Year	<030> Contact Name - Person USAC should contact regarding this data	<035> Contact Telephone Number - Number of person identified in data line <030> 4174399778 ext.	<039> Contact Email Address - Email Address of person identified in data line <030>
<010>	<015>	<020>	<030>	<032>	<039>

<701> Residential Local Service Charge Effective Date
<702> Single State-wide Residential Local Service Charge

<703>

1/1/2014

	_										
\$	Total per line Rates and Fees	31.26									
<	Mandatory Extended Area Service Charge	0.0									
 /p4>	State Universal Service Fee	1.26									
<	State Subscriber Line Charge	0.0									
<	Residential Local Service Rate	30.0									
 	Rate Type	FR									
<a3></a3>	SAC (CETC)										
<a2></a2>	Exchange (ILEC)	Lake Hinkle									
<a1></a1>	State	AR									

FCC Form 481	OMB Control No. 3060-0986/OMB Control No. 3060-0819	July 2013
(710) Broadband Price Offerings	Data Collection Form	

									lans											
							<d4></d4>	Usage Allowance Action Taken When Limit Reached {select}	Other, No qualifying broadband plans											
									Usage Allowance (GB)	0.0										
							<d3></d3>	(sc	0.0											
	SL CO				com		<d2></d2>	Broadband Service - Broadband Service Download Speed - Upload Speed (Mbi	0.0											
403031	SCOTT COUNTY TEL CO	2015	Karen Gilliam	4174399778 ext.	karen@scotttel.com		<c> <d1></d1></c>	Total Rates and Fees	0.0											
			this data	ied in data line <030>	fied in data line <030>		 <	State Regulated Fees	0.0											
			d contact regarding	oer of person identif	ess of person identified i	Contact Email Address - Email Address of person identified in data line <030>	יטכטי שווופ משמ ווו מפוניווופת ווופגושל וס ככי	 b1>	Residential Rate	0.0										
Sode	lame	ır	Contact Name - Person USAC should contact regarding this data	Contact Telephone Number - Number of person identified in data line	ıil Address - Email Addr		<a2></a2>	Exchange (ILEC)	Lake Hinkle											
Study Area Code	Study Area Name	Program Year	Contact Nam	Contact Tele	Contact Ema		<a1></a1>	State	AR											
<010>	<015>	<020>	<030>	<032>	<039>		<711>													

LINE 112 - FIVE-YEAR SERVICE QUALITY IMPROVEMENT PLAN

Following is the initial five-year service quality improvement plan for Scott County Telephone Company, Inc. ("Scott County" or "the Company") pursuant to 47 C.F.R. § 54.202(a)(1)(ii) that requires an eligible telecommunications carrier (ETC) to describe proposed improvements or upgrades to the ETC's network throughout its service area. The *USF/ICC Transformation Order* establishes a public interest obligation for rate-of-return ETCs to provide broadband service at speeds of at least 4 Mbps downstream and 1 Mbps upstream (4:1) "upon reasonable request." A service quality improvement plan cannot project where in the service area reasonable requests will be made. However, the proposed network investments in this plan ensure the continuation of high-quality voice and broadband services within the Company's service territory.

Although this plan is a good faith effort by the Company, it is subject to change, given the uncertainty faced by ETCs regarding whether capital investments will be recoverable over the five year planning horizon. Factors that may affect the capital improvements plan include erosion of the customer base due to competition, alternative technologies, economic conditions in the service area, and unpredictable changes in the universal service support amounts an ETC receives.

Scott County owns and operates one exchange serving subscribers located in the Ouachita mountains of Western Arkansas. The service area includes portions of Polk and Scott counties. The service area covers approximately 201 square miles.

Baseline Network Description



Table 1 - Current Broadband Capabilities

xchange Square Total Existing Name Miles Access Lines	Population	Total Broadband Capable Lines	Estimated Broadband Capable Population	% Broadband Capable
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2014 - 2019 Service Quality Improvement Plan

Table 2 provides Scott County's potential service quality improvements and associated capital expenditures for 2014 - 2019, by exchange, along with estimates of the population that will be served by the improvements.

	Estimated Population Served by Improvements	
	2019	
	2018	
nent Plan	2017	
Juality Improvement Plan	2016	
lable 2 – Service Ç	2015	
la la	2014	
	Description of Improvement	
	Exchange	

Narrative Description: 2014 - 2019



LINE 510 - SERVICE QUALITY STANDARDS AND CONSUMER PROTECTION RULES COMPLIANCE

Scott County Telephone Company (the Company) complies with applicable service quality standards and consumer protection rules as required by the Arkansas Public Service Commission and the Federal Communications Commission.

The rates, terms, and conditions under which the Company operates are outlined in its Local Exchange Tariff, which is approved by the state commission. The Company's tariff contains provisions regarding its customer service and protection practices, including resolving disputes with the Company, applying for service, the classification of business and residential rates, deposits, billing and payment for service, refusal, disconnection and cancellation of service. The tariff is available for customer review in the Business Office, as requested. Rates and terms of service are disclosed to customers upon application for service both verbally and in writing as part of a packet of information for new customers.

Service quality standards are established by the state commission and the Company consistently meets or exceeds the standards and provides reports to the state commission, in accordance with the state commission's rules.

With regard to broadband service, the Company provisions its network and equipment to ensure that its customers can enjoy the speeds to which they subscribe. However, Internet speeds generally result from a "best effort" service and are dependent upon a number of variables, many of which are outside the control of the Company.

The protection of customers' privacy and information is of utmost importance and the Company has a policy and established operating procedures that comply with the FCC's Customer Proprietary Network Information Rules (47 C.F.R. §§64.2001-64.2011). Certification and a description of those operating procedures are filed at the FCC annually.

LINE 610 - ABILITY TO FUNCTION IN EMERGENCY SITUATIONS

Scott County Telephone Company (the Company) is able to function in emergency situations. The Company has a reasonable amount of back-up power to ensure functionality without an external power source. Standby power generators are supplied at the central office, remote switch sites, and repeater sites to ensure functionality without an external power source until power is restored. The network is capable of managing traffic spikes resulting from emergency situations.

The company is able to reroute traffic around damaged facilities. Although the Company's ability to reroute traffic around damaged facilities is not absolute and may be limited in certain circumstances, there is a restoration plan in place for expeditious recovery of service, including splicing of damaged facilities when warranted.

LINE 1010 - VOICE SERIVCES RATE COMPARABILITY

The Wireline Competition Bureau's most recent reasonable comparability benchmark for voice services is \$46.96, which includes the federal subscriber line charge ("SLC").

In the exchange served by Scott County Telephone Company, the highest single-line residential local rate, including any mandatory extended area service charge, is \$30.00. When the federal SLC and the state universal service fee are added, the total is less than the reasonable comparability benchmark of \$46.96.

¹ Wireline Competition Bureau Announces Results of Urban Rate Survey for Voice Services; Seeks Comment on Petition for Extension of Time to Comply With New Rate Floor, WC Docket No. 10-90, DA 14-384 (rel. Mar. 20, 2014), p. 2.

LINE 1210 – TERMS & CONDITIONS OF VOICE TELEPHONY LIFELINE PLANS

Scott County Telephone Company, (the Company) provides a Federal Lifeline discount of \$9.25 applied to the SLC of \$6.50 with the remainder applied to the basic local exchange access line rate of \$30.00 (includes unlimited local minutes) for qualifying Lifeline subscribers in its Lake Hinkle exchange. Additional charges for toll calls associated with the basic local exchange access line are billed at the rates of the long distance carrier chosen by the subscriber. The Company currently has no calling plans that are specific to Lifeline and currently has no qualified Lifeline subscribers.

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number for this information collection is 0572-0031. The time required to complete this information collection is estimated to average 4 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS (Prepared with Audit and Dates) (Prepared with Audit and Audit and Dates) (Prepared with Audit and Audit and Dates) (Prepared with Audit and Dates) (Prepared	searching existing data sources, gathering and maintaining t			the collection of information	ding the time for reviewing	instructions,
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Prepared vit 1. Audited Data			s	Scott County Telephone Company		
December 2, 2013 \$A0548				(Prepared with Audited Data)		
CERTIFICATION	•					TION
We hereby certify that the extres in this report ore in accordance with the accounts and other records of the system and reflect the status of the system to the best of good between the status of the system to the least of the best of the system and reflect the status of the system to the least of the system to the status of the system to the status of the system to the status of the status	For detailed instructions, see RUS Bulletin 1744-2. R	eport in whole dollar	rs only.	December, 2013	AR0548	
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58. Total Equity (51 thru 57)						
	24. TOTAL ASSETS (10+1/+23)					
				58. Total Equity (51 thru 57) 59. TOTAL LIABILITIES AND EQUITY (35+46+50+58)		

USDA-RUS

48. DSCR [(31+26+10+11) / 44]

OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

BORROWER DESIGNATION

AR0548

PERIOD ENDING

	D 1 2012		
INSTRUCTIONS- See RUS Bulletin 1744-2	December, 2013		
PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS			
ITEM		PRIOR YEAR	THIS YEAR
Local Network Services Revenues			
Network Access Services Revenues			
Long Distance Network Services Revenues			
Carrier Billing and Collection Revenues			
Miscellaneous Revenues			
Uncollectible Revenues			
7. Net Operating Revenues (1 thru 5 less 6)			
Plant Specific Operations Expense			
Plant Nonspecific Operations Expense (Excluding Depreciation & American Depreciation & Depreciation	nortization)		
10. Depreciation Expense			
11. Amortization Expense			
12. Customer Operations Expense			
13. Corporate Operations Expense			
14. Total Operating Expenses (8 thru 13)			
15. Operating Income or Margins (7 less 14)			
16. Other Operating Income and Expenses			
17. State and Local Taxes			
18. Federal Income Taxes			
19. Other Taxes			
20. Total Operating Taxes (17+18+19)			
21. Net Operating Income or Margins (15+16-20)			
22. Interest on Funded Debt			
23. Interest Expense - Capital Leases			
24. Other Interest Expense			
25. Allowance for Funds Used During Construction			
26. Total Fixed Charges (22+23+24-25)			
27. Nonoperating Net Income			
28. Extraordinary Items			
29. Jurisdictional Differences			
30. Nonregulated Net Income			
31. Total Net Income or Margins (21+27+28+29+30-26)			
32. Total Taxes Based on Income			
33. Retained Earnings or Margins Beginning-of-Year			
34. Miscellaneous Credits Year-to-Date			
35. Dividends Declared (Common)			
36. Dividends Declared (Preferred)			
37. Other Debits Year-to-Date			
38. Transfers to Patronage Capital			
39. Retained Earnings or Margins End-of-Period [(31+33+34) - (35+36	6+37+38)]		
40. Patronage Capital Beginning-of-Year			
41. Transfers to Patronage Capital			
42. Patronage Capital Credits Retired			
43. Patronage Capital End-of-Year (40+41-42)	i		
44. Annual Debt Service Payments	i		
45. Cash Ratio [(14+20-10-11) / 7]	İ		
46. Operating Accrual Ratio [(14+20+26) / 7]			
47. TIER [(31+26) / 26]			
40. DCCD (/24 - 26 - 40 - 44) / 441			

			USDA-RUS			BORROWER	DESIGNATION
	т		TING REPORT F NICATIONS BOR			AR0548 PERIOD END December, 20	In FeS
		INSTRUCTIO	NS - See RUS Bulletin 1	744-2			
	Part C. S	SUBSCRIBER (AC	CCESS LINE), ROUTI	E MILE, & HIGH SPEE	D DATA INFORM	MATION	
	1. RA	ATES	2. SUB	SCRIBERS (ACCESS LIN	ES)	3. ROUTE	MILES
EXCHANGE	B-1 (a)	R-1 (b)	BUSINESS (a)	RESIDENTIAL (b)	TOTAL (c)	TOTAL (including fiber) (a)	FIBER (b)
Lake Hinkle	S 22 22 1 22		537				0.163
MobileWireless	-13				25	2	
Route Mileage Outside Exchange Area					-		
Total							
No. Exchanges							

BORROWER DESIGNATION USDA-RUS AR0548 **OPERATING REPORT FOR** PERIOD ENDED **TELECOMMUNICATIONS BORROWERS** December, 2013 INSTRUCTIONS - See RUS Bulletin 1744-2 Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION 4. BROADBAND SERVICE **Details on Least Expensive Broadband Service** No. Access Lines with BB available (a) Advertised Download Rate (Kbps) (d) Advertised Upload Rate (Kbps) (e) Type Of Technology No Of Broadband Subscribers Number Of Subscribers **EXCHANGE** Price Per Month Standalone/Pckg (C) (f) (f) (g) Lake Hinkle

Total

REDACTED-FOR PUBLIC INSPECTION

	LIODA BLIO				OKT OBLIC II	
	USDA-RUS			BORROWER DE	SIGNATION	
	OPERATING REPORT FOR	1		AR0548		
	TELECOMMUNICATIONS BORRO	WERS		PERIOD ENDING		
				December, 2	013	
INSTRUCTIONS- See RUS Bullet	tin 1744-2					
		PART D. SYSTEM	1 DATA			
1 No Plant Employees	2 No Other Employees	3 Square Miles Served		4 Access Lines per Squar	e	5 Subscribers per Route Mile
		PART E. TOLL	DATA		•	
4. Chudu Area ID Code(a)	2. Times of Tall Co	attlemente (Cheek an	-1			
Study Area ID Code(s)		ettlements (Check one		Average Sahadul	_	X Cost Basis
	a		Interstate:	Average Schedule	9	X Cost Basis
	b. c.		Intrastate:	Average Schedule	e	X Cost Basis
	d					
	e					
	f					
	g					
	h					
	i.					
	j					
	PART F. FU	NDS INVESTED IN F	PLANT DURING YE	AR		
1. RUS, RTB, & FFB Loan Funds	Expended					
2. Other Long-Term Loan Funds	Expended					
3. Funds Expended Under RUS I	nterim Approval					
4. Other Short-Term Loan Funds	Expended					
5. General Funds Expended (Oth	ner than Interim)					
Salvaged Materials						
7. Contribution in Aid to Construc	tion					
8. Gross Additions to Telecom. P	lant (1 thru 7)					
	PART G. IN	VESTMENTS IN AFF	ILIATED COMPANI	IES		
		CURRENT Y	EAR DATA		CUMULATIVE DA	ATA
				Cumulative	Cumulative	
IN	IVESTMENTS	Investment	Income/Loss	Investment	Income/Loss	Current
		This Year	This Year	To Date	To Date	Balance
	(a)	(b)	(c)	(d)	(e)	(f)
Investment in Affiliated Compa						~′′
Investment in Affiliated Compa	·					

USDA-RUS

BORROWER DESIGNATION		
AR0548		
PERIOD ENDING		
December, 2013		

OPERATING REPORT FOR	AR0548		
TELECOMMUNICATIONS BORROWERS	PERIOD ENDING		
	December, 2013		
PART H. CURREN	IT DEPRECIATION RATES		
Are corporation's depreciation rates approved by the regulatory authority with jurisdiction over the provision of telephone services? (Check one)		YES	X NO
EQUIPMENT CATEGORY		DEPRECIA	ATION RATE
Land and support assets - Motor Vehicles			
Land and support assets - Aircraft			
Land and support assets - Special purpose vehicles			
Land and support assets - Garage and other work equipment			
5. Land and support assets - Buildings			
Land and support assets - Furniture and Office equipment		_	
7. Land and support assets - General purpose computers			
Central Office Switching - Digital			
9. Central Office Switching - Analog & Electro-mechanical		-	
10. Central Office Switching - Operator Systems		-	
11. Central Office Transmission - Radio Systems		-	
12. Central Office Transmission - Circuit equipment		-	
13. Information origination/termination - Station apparatus		-	
14. Information origination/termination - Customer premises wiring	100	-	
15. Information origination/termination - Large private branch exchang		-	
 Information origination/termination - Public telephone terminal equ Information origination/termination - Other terminal equipment 	ipment	-	
Cable and wire facilities - Poles		-	
Cable and wire facilities - Aerial cable - Metal			
20. Cable and wire facilities - Aerial cable - Fiber			
21. Cable and wire facilities - Underground cable - Metal			
22. Cable and wire facilities - Underground cable - Fiber		-	
23. Cable and wire facilities - Buried cable - Metal			
24. Cable and wire facilities - Buried cable - Fiber			
25. Cable and wire facilities - Conduit systems		7	
26. Cable and wire facilities - Other			

USDA-RUS

OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

BORROWER DESIGNATION

AR0548

PERIOD ENDED

December, 2013

 $\label{eq:instructions} \textbf{INSTRUCTIONS}-\textbf{See} \ \textbf{help} \ \textbf{in} \ \textbf{the} \ \textbf{online} \ \textbf{application}.$

PART I – STATEMENT OF CASH FLOWS

1.	Reginning Cash (Cash and Equivalents plus PUS Construction Fund)	\neg
1.	Beginning Cash (Cash and Equivalents plus RUS Construction Fund) CASH FLOWS FROM OPERATING ACTIVITIES	_
2		
2.	Net Income	
	Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities	
3.	Add: Depreciation	
4.	Add: Amortization	
5.	Other (Explain) Amortization expense included twice, rounding	
	importization expense included ewice, rounding	
	Changes in Operating Assets and Liabilities	
6.	Decrease/(Increase) in Accounts Receivable	
7.	Decrease/(Increase) in Materials and Inventory	
8.	Decrease/(Increase) in Prepayments and Deferred Charges	
9.	Decrease/(Increase) in Other Current Assets	
10.	Increase/(Decrease) in Accounts Payable	
11.	Increase/(Decrease) in Advance Billings & Payments	
12.	Increase/(Decrease) in Other Current Liabilities	
13.	Net Cash Provided/(Used) by Operations	
	CASH FLOWS FROM FINANCING ACTIVITIES	
14.	Decrease/(Increase) in Notes Receivable	
15.	Increase/(Decrease) in Notes Payable	
16.	Increase/(Decrease) in Customer Deposits	
17.	Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)	
18.	Increase/(Decrease) in Other Liabilities & Deferred Credits	
19.	Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital	
20.	Less: Payment of Dividends	
21.	Less: Patronage Capital Credits Retired	
22.	Other (Explain)	
23.	Net Cash Provided/(Used) by Financing Activities	4
	CASH FLOWS FROM INVESTING ACTIVITIES	_
24.	Net Capital Expenditures (Property, Plant & Equipment)	
25.	Other Long-Term Investments	
26.	Other Noncurrent Assets & Jurisdictional Differences	
27.	Other (Explain)	
28.	Net Cash Provided/(Used) by Investing Activities	
29.	Net Increase/(Decrease) in Cash	
30.	Ending Cash	\exists
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Part I - Line 5

This amount includes \$1 for rounding and \$641 for amortization expense that was added on the previous line and was also included in the change in "(Increase) decrease in Other Assets and Deferred Charges".

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